

Mr. Paul Spaulding, ARAR Coordinator  
Virginia Superfund Program  
Department of Waste Management  
James Moore Building, 11th Floor  
101 North Fourteenth Street  
Richmond, Virginia 23219

Re: Exeter PCB Site ARARs

Dear Mr. Spaulding:

Thank you for your timely response to our ARAR request letter. At the current time, EPA does not plan to conduct any onsite disposal or treatment of wastes. Therefore, drums of hazardous substances and PCB transformers and other generated waste (decontamination wastes, PPE, etc.) will be disposed of at permitted hazardous waste facilities in accordance with Federal and state laws and regulations. EPA will, to the extent practicable, comply with the regulations regarding use and management of tanks and drums that you have cited, if EPA handles the drums and tanks. More importantly, EPA will provide a copy of this letter and your letter to Firestone which has agreed to handle the disposal of drums and the hazardous contents of tanks pursuant to an EPA Administrative Order.


You did not list any specific ARARs pertaining to decontamination of PCB contaminated surfaces, therefore EPA will rely solely on Federal regulations and policy pursuant to TSCA for PCB spill clean-up criteria.

At this time, EPA does not have any plans to disturb or excavate soils or to treat water or discharge to surfacewater or groundwater. Should we undertake any such actions we will look to the Commonwealth regulations which govern such activities for an ARAR determination.

As regards asbestos activities, EPA will review the new Commonwealth regulations for asbestos handling and disposal before any asbestos response activities are undertaken. EPA has not approved any funding or asbestos related response actions at this time.

Please contact me at (215) 597-6678 if you have any questions.

Sincerely,



William D. Steuteville  
On-Scene Coordinator  
Superfund Removal Branch

cc: Tracey Ledder de Frias, VADWM  
Aubry Tyree, Firestone (w/attachment)  
Chris Wagner, (3HW33)

3/17/93

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